UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

DEC 1 0 2019

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Chris Casperson
Managing Member and President
Pypes Performance Exhaust, LLC
2705 Clemens Road, Bldg 105a
Hatfield, PA 19440

Re: Notice of Violation of the Clean Air Act

Dear Mr. Casperson,

The United States Environmental Protection Agency ("EPA") has investigated and continues to investigate Pypes Performance Exhaust, LLC ("Pypes") for compliance with the Clean Air Act ("CAA"), 42 U.S.C. §§ 7401–7671q, and its implementing regulations. As summarized in this Notice of Violation ("NOV"), the EPA has determined that between January 2016 and June 2019, Pypes offered for sale and/or sold parts or components that have a principal effect of bypassing, defeating, or rendering inoperative emission control systems or elements of design on motor vehicles or motor vehicle engines. Such emission control systems and elements of design are installed by a vehicle or engine original equipment manufacturer ("OEM") in order to comply with CAA emission standards. The EPA has also determined that Pypes knew or should have known that these parts or components were offered for sale or installed for such use or put to such use. Therefore, Pypes violated section 203(a)(3)(B) of the CAA, 42 U.S.C. § 7522(a)(3)(B).

Law Governing Alleged Violations

This NOV arises under Part A of Title II of the CAA, 42 U.S.C. §§ 7521–7554, and the regulations promulgated thereunder. In creating the CAA, Congress found, in part, that "the increasing use of motor vehicles...has resulted in mounting dangers to the public health and welfare."[1] Congress' purpose in creating the CAA, in part, was "to protect and enhance the quality of the Nation's air resources so as to promote the public health and welfare and the productive capacity of its population," and "to initiate and accelerate a national research and development program to achieve the prevention and control of air pollution."[2]

The EPA's allegations here concern parts or components for motor vehicles and engines subject to emission standards.[3] The CAA requires the EPA to prescribe and revise, by regulation, standards applicable to the emission of any air pollutant from new motor vehicles or new motor

1 CAA § 101(a)(2), 42 U.S.C. § 7401(a)(2).
2 CAA § 101(b)(1)-(2), 42 U.S.C. § 7401(b)(1)-(2).
3 *See generally* 40 C.F.R. Part 86, Subpart A (setting emission standards for these categories).

vehicle engines that cause or contribute to air pollution which may reasonably be anticipated to endanger public health or welfare.[4] As required by the CAA, the emission standards "reflect the greatest degree of emission reduction achievable through the application of [available] technology."[5] There are specific emission standards for each of these motor vehicles and engines for each pollutant and year of manufacture.[6]

The CAA makes it a violation "for any person to manufacture or sell, or offer to sell, or install, any part or component intended for use with, or as part of, any motor vehicle or motor vehicle engine, where a principal effect of the part or component is to bypass, defeat, or render inoperative any device or element of design installed on or in a motor vehicle or motor vehicle engine in compliance with regulations under this subchapter, and where the person knows or should know that such part or component is being offered for sale or installed for such use or put to such use."[7] It is also a violation to cause any of the foregoing acts.[8]

EPA Certification Program

The EPA administers a certification program to ensure that every motor vehicle and motor vehicle engine introduced into United States commerce satisfies applicable emission standards. Under this program, the EPA issues certificates of conformity ("COCs"), and thereby approves the introduction of motor vehicles or motor vehicle engines into United States commerce. To obtain a COC, a vehicle manufacturer must submit a COC application to the EPA for each engine family or test group of vehicles that it intends to enter into United States commerce.[9] The COC application must include, among other things, identification of the covered engine family, a description of the motor vehicle or engine and its emission control systems, all auxiliary emission control devices ("AECDs")[10] and the engine parameters they sense, as well as test results from a test vehicle or engine showing that it satisfies the applicable emission standards.[11] Motor vehicle manufacturers employ many devices and elements of design to meet emission standards to obtain COCs. *Element of design* means "any control system (i.e., computer software, electronic control system, emission control system, computer logic), and/or control system calibrations, and/or the results of systems interaction, and/or hardware items on a motor vehicle

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4 CAA §§ 202(a)(1) and (3)(B), 42 U.S.C. §§ 7521(a)(1) and (3)(B).

5 CAA § 202(a)(3)(A)(i), 42 U.S.C. § 7521(a)(3)(A)(i).

6 *See, e.g.*, heavy-duty diesel engine emission standards at 40 C.F.R. §§ 86.004-11, 86.007-11, 86.099-11 and light-duty vehicle emission standards at 40 C.F.R. § 86.1811-04. *See also* 40 C.F.R. §§ 86.090-8 (1990 and later model year light-duty vehicles); 86.094-9 (1994 and later model year light-duty trucks); 86.001-9 (2001 and later model year light-duty trucks); 86.004-9 (2004 and later model year light-duty trucks); 86.091-10 (1991 and later model year Otto-cycle heavy-duty engines and vehicles); 86.008-10 (2008 and later model year Otto-cycle heavy-duty engines and vehicles).

7 CAA § 203(a)(3)(B), 42 U.S.C. § 7522(a)(3)(B).

8 CAA § 203(a), 42 U.S.C. § 7522(a).

9 *See* 40 C.F.R. §§ 86.004-21 and 86.1844-01. Motor vehicles can be certified in a motor vehicle test group or engine family. For simplicity, for the remainder of this NOV, EPA will use the nomenclature "motor vehicles" to refer to both motor vehicles and motor vehicle engines.

10 An AECD is "any element of design which senses temperature, vehicle speed, engine RPM, transmission gear, manifold vacuum, or any other parameter for the purpose of activating, modulating, delaying, or deactivating the operation of any part of the emission control system." 40 C.F.R. § 86.082-2.

11 40 C.F.R. §§ 86.004-21, 86.007-21, 86.094-21, 86.096-21; *see also* EPA, *Advisory Circular Number 24-3: Implementation of Requirements Prohibiting Defeat Devices for On-Highway Heavy-Duty Engines* (Jan. 19, 2001).

or motor vehicle engine."[12] For example, manufacturers of diesel engines employ retarded fuel injection timing as a primary emission control device for emissions of oxides of nitrogen ("NOx"), while manufacturers of gasoline-powered engines employ spark timing as an emission control device. Manufacturers also employ certain hardware devices as emission control systems to manage and treat exhaust to reduce levels of regulated pollutants from being created or emitted into the ambient air. Such devices include catalytic converters, oxygen sensors, exhaust gas recirculation ("EGR") systems, and electronic control modules ("ECMs"). All modern motor vehicles are equipped with ECMs. ECMs continuously monitor engine and other operating parameters and control the emission control devices, such as the fueling strategy.

Also, an onboard diagnostic system ("OBD") with the capacity to detect, identify and record malfunctions must be installed and operated on motor vehicles under section 202(m) of the CAA, 42 U.S.C. § 7521(m), and the implementing regulations.[13] Manufacturers are required to demonstrate (using EPA specified test procedures) that the OBD system detects and identifies malfunctions, including any sensor or other component deterioration or malfunction which renders that sensor or component incapable of adequately performing its function, including the oxygen sensor on vehicles equipped with an oxygen sensor.[14] Oxygen sensors are categorized in EPA's regulations as a "major" diagnostic monitor tracked by an OBD system, along with monitors for the catalyst/exhaust after treatment devices, engine misfire, and evaporative leaks.[15]

Alleged Violations

On August 28, 2018, the EPA issued Pypes a Request for Information pursuant to section 208 of the CAA, 42 U.S.C. § 7542 (the "RFI"). Pypes responded to the EPA's RFI on October 10, 2018, and later supplemented its October 10, 2018 response on the dates of: November 9, 2018, May 31, 2019, June 6, 2019, June 28, 2019, and July 8, 2019. Based on Pypes' responses to the RFI, the EPA has determined that Pypes offered for sale, and/or sold parts or components that have a principal effect of bypassing, defeating, or rendering inoperative emission control systems or elements of design on motor vehicles or motor vehicle engines. Specifically, between January 2016 and June 2019, Pypes sold 23,378 individual catalytic converter delete pipes ("defeat devices"). The 23,378 defeat devices sold by Pypes correspond to 77 unique catalytic converter delete pipe part numbers that were offered for sale for multiple vehicle makes, models, and model years.

The 23,378 defeat devices that Pypes sold between January 2016 and June 2019 are detailed in Attachment A. As of the date of this letter, Pypes continues to offer a portion of these catalytic converter delete pipes for sale on its website at, https://pypesexhaust.com/, and through the company's extensive parts catalog. While some parts have been discontinued, at least one part is still being offered for sale on Pype's website (Part # HDR76SK), and a number of others remain available for sale through other vendors. Based upon information provided by Pypes in the RFI, Pypes currently holds about 873 of these parts in inventory (as shown in Attachment A).

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12 40 C.F.R. § 86.1803-01. *See also* 40 C.F.R. § 86.094-2.
13 *See* 40 C.F.R. §§ 86.005-17, 86.007-17, 86.1806–05; and § 86.1806-17 (for model year 2017 and later vehicles).
14 *See* 40 C.F.R. § 86.1806–05(i).
15 *See id.* (using the more general term "exhaust after treatment devices" and including diesel exhaust gas recirculation, if equipped).

Pypes knew or should have known that these products were sold and/or offered for sale to bypass, defeat, or render inoperative devices or elements of design that control emissions of regulated air pollutants. The catalytic converter delete pipes offered for sale, and/or sold by Pypes physically replace emission control devices such as catalytic converters, oxygen sensors, diesel particulate filters (DPFs), diesel oxidation catalysts (DOCs), and selective catalytic reduction systems (SCRs), and several parts such as the "Cat Delete Pipe DFM76" contain the term "Cat Delete" within the part name itself. Further, the Cat Delete Pipe DFM76 part is listed for model year 2011-2014 Ford Mustangs and is specifically marketed to, "...improve performance and adds even more horsepower and torque to the rear wheels of your Mustang by eliminating the catalytic converters." (http://pypesexhaust.com/i-20746606-11-14-cat-delete-pipes-dfm76.html as of June 20, 2018)

Additionally, despite Pypes' sale of some products advertised for "off road or competition use only" or "race use only", Pypes knew or should have known that these products were, in fact, offered for sale for "motor vehicles" or "motor vehicle engines", and that these products were designed and marketed for use on a specific make, model, and year of motor vehicles, to alter OEM configuration certified by EPA for a specific make, model and year. Under the CAA, there is no "competition use only" exemption under Section 203(a)(3)(B) of the CAA for motor vehicles or motor vehicle engines, or under the definition of "motor vehicle" in Section 216(2) of the CAA. "Motor vehicle" is defined as "any self-propelled vehicle designed for transporting persons or property on a street or highway." CAA §216(2); 42 U.S.C. § 7550(2); see also 40 C.F.R. § 85.1703 (further defining "motor vehicle"). These definitions make no exemption for motor vehicles or motor vehicle engines used for competition.[16] More generally, these definitions are based on vehicle attributes (*e.g.,* ability to travel over 25 miles per hour, lack of features that render street use unsafe) and make no exemption for vehicles based on their use.

Through the offering for sale and/or sale of these catalytic converter delete pipes, Pypes rendered inoperative the OEM's hardware. These parts change the elements of design and allow motor vehicles to function with altered inputs from emissions control devices. Therefore, Pypes knew or should have known that they sold and offered for sale parts or components for motor vehicle engines with a principal effect of bypassing, defeating, or rendering inoperative devices or elements of design that control emissions of regulated air pollutants. [17]

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16 In contrast, the CAA exempts from the definition of "nonroad vehicle" and "nonroad engine" those vehicles and engines used solely for competition. CAA § 216(10)-(11); 42 U.S.C. § 7550(10)-(11). The EPA has implemented regulations describing how to exempt from CAA requirements nonroad vehicles and engines used solely for competition. 40 C.F.R. §1068.235. These regulations explicitly do not apply for motor vehicles and motor vehicle engines. 40 C.F.R. § 85.1701(a)(1).

17 EPA has initiated enforcement actions that are now concluded for similar operations. *See, e.g.,* https://www.epa.gov/enforcement/clean-air-act-vehicle-and-engine-enforcement-case-resolutions

Some of the product descriptions used by Pypes in its marketing and other informational materials (including Pypes' online website) concerning the parts or components it sold make it clear that the company knew, or should have known, that such part or component had the principle effect of bypassing, defeating, or rendering inoperative any devices or elements of design that control emissions of regulated air pollutants on or in a motor vehicle or motor vehicle engined, and that such part or component would be put to such use, in violation of Section 203(a)(3)(B) of the CAA, 42 U.S.C. §7522(a)(3)(B). For example, Pypes sells and offers for sale a turbo back exhaust system for model year 2004 to 2007 Dodge 5.9-liter diesel trucks (STD061). The installation guide for this part includes the statement, "If your vehicle is equipped with a catalytic converter, it is unlawful to remove." However, the installation photos posted on Pype's website show a truck with STD061 installed without a catalytic converter. The truck in the photographs is registered for use in Pennsylvania. (See https://pypesexhaust.com/i-13475238-04-07-dodge-5-9l-600-5-turbo-back-system-std061.html as of November 4, 2019)

Response to Request for Information

The violations of section 203(a)(3)(B) of the CAA, 42 U.S.C. § 7522(a)(3)(B), described in this NOV are based, in part, on Pypes' October 10, 2018 initial response, and supplemental responses as identified above to the RFI. Pypes certified under penalty of law on May 31, 2019, and again on June 6, 2019, that the information provided in those RFI responses were true and complete. Pypes must continue to promptly supplement its responses to the RFI in the event that Pypes learns that it possesses information not yet produced, or where Pypes gains possession, custody, or control of responsive information after initially responding to the RFI. For example, if the number of sales of the products listed in Attachment A has increased and/or the number of such products held in inventory has changed, Pypes must supplement its response to the RFI. EPA expects that updates will be necessary given that several parts listed under Attachment A do not appear to have been discontinued.

Enforcement

The EPA may bring an enforcement action for violations of section 203(a)(3)(B) of the CAA, 42 U.S.C. § 7522(a)(3)(B), under its administrative authority or request that the United States Department of Justice file a civil complaint in federal district court.[18] Persons who violate section 203(a)(3)(B) of the CAA, 42 U.S.C. § 7522(a)(3)(B), may be subject to an injunction and/or civil penalty of up to $4,735 for each violation.[19]

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[18] CAA §§ 204 and 205, 42 U.S.C. §§ 7523 and 7524.

[19] *Id.*; the EPA has implemented statutorily-mandated inflation adjustments by periodically updating maximum penalty levels as codified at 40 C.F.R. § 19.4.

The EPA may also bring an enforcement action for violations of section 203(a)(2)(A) of the CAA, 42 U.S.C. § 7522(a)(2)(A), for failure provide information required under section 208(a) of the CAA, 42 U.S.C. § 7542(a), under its administrative authority or request that the United States Department of Justice file a civil complaint in federal district court.[20] Persons who violate section 203(a)(2)(A) of the CAA, 42 U.S.C. § 7522(a)(2)(A), may be subject to an injunction and/or civil penalty of up to $46,192 per day of violation.[21]

The EPA is available to discuss this matter with you in further detail upon your request. Please have your attorney contact the attorney assigned to this matter, Dennis M. Abraham, Senior Assistant Regional Counsel, within 10 days of receipt of this Notice of Violation. Mr. Abraham can be reached at (215) 814-5214 or abraham.dennis@epa.gov.

Sincerely,

Karen Melvin, Director
U.S. Environmental Protection Agency Region III
Enforcement and Compliance Assurance Division
(ECAD)

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[20] CAA §§ 204 and 205, 42 U.S.C. §§ 7523 and 7524.
[21] *Id.*; 40 C.F.R. § 19.4 and footnote 19

Attachment A: List of Defeat Devices Sold by Pypes as Identified in RFI Responses

Part #	Description	Number Sold	Inventory as of 5/30/2019	Make	Model	Engine	Year Range	Discontinued?
DFM76	2011-2014 Cat Del Pipes	(b) (4)	184	Ford	Mustang	5.0 litre	2011-2014	Yes
DFM80	2015-17 MUST. ECO BOOST DOWNPIPE		81	Ford	Mustang	3.8 litre	2015-2017	Yes
HDR140S	2008-09 G8 LT HEADERS		0	Pontiac	G8	6.0 litre	2008-2009	No
HDR40SK-2	2006-14 DODGE R/T LT HEADER OR		1	Dodge	Challenger	5.7 litre	2006-2014	Yes
HDR72SK	2011-14 Long Tube Headers W/X-pipe		4	Ford	Mustang	5.0 litre	2011-2014	Yes
HDR76SK-2	2011-14 MUST LT W/ OR X		73	Ford	Mustang	5.0 litre	2011-2014	Yes
HDR78SK-2	2015-17 MUST LT OFF ROAD HEADE		0	Ford	Mustang	5.0 litre	2015-2017	Yes
HDR78SK-3	2015-17 MUST LT 3" OFF RD HEAD		0	Ford	Mustang	5.0 litre	2015-2017	Yes
HDR79SK-2	2018 MUST LT OFF ROAD HEADER KIT		0	Ford	Mustang	5.0 litre	2018	Yes
HDR79SK-3	2018 MUST LT 3" OFF RD HEADER KIT		0	Ford	Mustang	5.0 litre	2018	Yes
HFM16	99-04 MUSTANG OFF ROAD H-PIPE		10	Ford	Mustang	4.6 litre	1999-2004	Yes
HFM17	99-04 Mustang Off Road H-Box		18	Ford	Mustang	4.6 litre	1999-2004	Yes
HFM22	05-10 MUSTANG OFF ROAD H-BOX		0	Ford	Mustang	4.6 litre	2005-2010	Yes
HFM23	2005-10 Off-Road Mustang H		0	Ford	Mustang	4.6 litre	2005-2010	Yes
HFM24	2011-14 Mustang Off-Road H		5	Ford	Mustang	5.0 litre	2011-2014	Yes
HFM53	98-1/2 -04 H LT off road		46	Ford	Mustang	4.6 litre	1998	Yes
HFM55	05-10 H LT off road modular		0	Ford	Mustang	4.6 litre	2005-2010	Yes
PVC10	2.5" cat delete dump pipe		0	Chevrolet	Monte		1978-1988	Yes
PVC11	2.5" cat delete dump pipe		19	Chevrolet	Monte		1978-1988	Yes
PVC13	3" cat delete dump pipe		44	Chevrolet	Monte		1978-1988	Yes
SCC10	74-80 C3 2.5 w/X NO MUFFLERS		0	Chevrolet	Corvette	350	1974-1980	No
SCC10R	74-80 C3 2.5 w/X Race Pro		0	Chevrolet	Corvette	350	1974-1980	No
SCC10S	74-80 C3 2.5 w/X Street Pro		0	Chevrolet	Corvette	350	1974-1980	No
SCC10V	74-80 C3 2.5 w/X VL muffler		0	Chevrolet	Corvette	350	1974-1980	No
SFM52	98-04 V6 DUAL wo cats downturn		0	Ford	Mustang	3.8 litre	1998-2004	Yes
SFM55	98-04 V6 DUAL 3" TIPS w/o cats		6	Ford	Mustang	3.8 litre	1998-2004	Yes
SFM55B	98-04 V6 DUAL 3" TIPS BLACK		0	Ford	Mustang	3.8 litre	1998-2004	Yes
SGF11	2.5" F-X w/X no muff		13	Chevrolet	Camaro		1970-1981	No

[22] The numbers shown here are reproduced verbatim from Pypes' RFI response.

Part #	Description	Number Sold	Inventory as of 5/30/2019	Make	Model	Engine	Year Range	Discontinued?
SGF11R	70-81 X-F 2.5 w/X RP muffler	(b) (4)	13	Chevrolet	Camaro		1970-1981	No
SGF11S	70-81 X-F 2.5 X rear exit SP muffler		13	Chevrolet	Camaro		1970-1981	No
SGF11V	70-81 X-F 2.5 w/X rr exit VL muffler		13	Chevrolet	Camaro		1970-1981	No
SGF13	70-81 X-F 3" W/X NO MUFF		6	Chevrolet	Camaro		1970-1981	No
SGF13R	70-81 3" w/X qtr exit RP muffler		6	Chevrolet	Camaro		1970-1981	No
SGF13S	70-81 X-F 3" X qtr exit SP muffler		6	Chevrolet	Camaro		1970-1981	No
SGF13SS	70-81 X-F 3" X 304 STNLS		0	Chevrolet	Camaro		1970-1981	Yes
SGF13V	3" 70-81 X-F qtr exit w/X VL muffler		6	Chevrolet	Camaro		1970-1981	No
SGF15	70-81 F-body for DSE Quadra LN		2	Chevrolet	Camaro		1970-1981	No
SGF15R	70-81 F-body for DSE Quadra LN		8	Chevrolet	Camaro		1970-1981	No
SGF15SSR	70-81 F-body for DSE Quadra LN		0	Chevrolet	Camaro		1970-1981	Yes
SGF31	70-81 2.5" no X NO MUFF		5	Chevrolet	Camaro		1970-1981	No
SGF31R	70-81 2.5" w/o X rear exit RP muffler		5	Chevrolet	Camaro		1970-1981	No
SGF31S	70-81 2.5" w/o X rear exit SP muffler		5	Chevrolet	Camaro		1970-1981	No
SGF31V	70-81 2.5" w/o X rear exit VL muffler		5	Chevrolet	Camaro		1970-1981	No
SGF70	2.5" 67-81 F Crossflow w/X		0	Chevrolet	Camaro		1970-1981	No
SGF70S	2.5" X-F Crossflow T304		4	Chevrolet	Camaro		1970-1981	No
SGG12	78-88 2.5" w/X SS NO MUFF		26	Chevrolet	G-Body		1978-1988	No
SGG12R	78-88 G 2.5" w/X SS RP muffler		26	Chevrolet	G-Body		1978-1988	No
SGG12S	78-88 2.5" w/X SS SP mufflers		26	Chevrolet	G-Body		1978-1988	No
SGG12V	78-88 2.5" w/X SS VL mufflers		26	Chevrolet	G-Body		1978-1988	No
SGN75	75-79 Nova 2.5" X NO MUFF		3	Chevrolet	Nova		1975-1979	No
SGN75R	75-79 Nova 2.5" X RP mufflers		3	Chevrolet	Nova		1975-1979	No
SGN75S	75-79 Nova 2.5" X SP mufflers		3	Chevrolet	Nova		1975-1979	No
SGN75V	75-79 Nova 2.5" X VL mufflers		3	Chevrolet	Nova		1975-1979	No
STD033	03-07 Ford 4" Turboback stainless		3	Ford	truck	6.0	2003-2007	No
STD060	2003-04.5 Dodge 5" Turboback Stainless		5	Dodge	truck	5.9 litre	2003-2004	No
STD061	5" 04.5-07 DODGE 5.9L 600 TB S		5	Dodge	truck	5.9 litre	2004-2007	No
STD061F	05-10 Dodge 5.9/6.7 5" Turboback ACC		0	Dodge	truck	5.9 litre	2004-2007	Yes
STD080	2001-07 Chevy 4" Turboback Stainless		3	Chevrolet	truck	6.6	2001-2007	No
STD080NM	2001-07 Chevy 4" Turboback NM		0	Chevrolet	truck	6.6	2001-2007	Yes
XFM10	79-95 Mustang off road X pipe		0	Ford	Mustang	4.6 litre	1979-1995	Yes
XFM10U	private label product		0	Not Provided				Yes
XFM13	96-98 Mustang OFF ROAD X-PIPE		26	Ford	Mustang	4.6 litre	1996-1998	Yes
XFM13U	private label product		0	Not Provided				Yes

Part #	Description	Number Sold	Inventory as of 5/30/2019	Make	Model	Engine	Year Range	Discontinued?
XFM13USS	private label product	(b) (4)	0	Not Provided				Yes
XFM16	99-04 MUSTANG OFF ROAD X-PIPE		0	Ford	Mustang	4.6 litre	1999-2004	Yes
XFM16U	private label product		0	Not Provided				Yes
XFM16USS	private label product		0	Not Provided				Yes
XFM17	99-04 Mustang Off Road X-Box		22	Ford	Mustang	4.6 litre	1999-2004	Yes
XFM19	98-04 V6 X 2.5" off road		1	Ford	Mustang	4.6 litre	1998-2004	Yes
XFM23	05-10 Mustang Off-Road X		1	Ford	Mustang	4.6 litre	2005-2010	Yes
XFM23U	private label product		0	Not Provided				Yes
XFM24	2011-14 Mustang Off-Road X		0	Ford	Mustang	5.0 litre	2011-2014	Yes
XFM25	OFF ROAD X-PIPE FOR HDR72S		17	Ford	Mustang	5.0 litre	2011-2014	Yes
XFM55	05-10 X LT off road modular		0	Ford	Mustang	4.6 litre	2005-2010	Yes
XFM7000-11	private label product		0	Not Provided				Yes
XFM7000-11AL	private label product		0	Not Provided				Yes
XFM75	X-PIPE FOR HDR76S- off road		73	Ford	Mustang	5.0 litre	2011-2014	Yes
		23,378	**873**					